IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD CHAKEJIAN,	
on behalf of himself and all others	
similarly situated,	
Plaintiffs,) vs.)	C. A. No. 07- 2211
EQUIFAX INFORMATION SERVICES LLC,)	CLASS ACTION
Defendant.)	

PLAINTIFFS' PROPOSED VOIR DIRE

Class Representative Richard Chakejian, by and through his undersigned counsel, on behalf of the Class, respectfully submits the following Proposed Voir Dire.

- 1. Have you or has anyone you know ever worked for Equifax, Trans Union, Experian, or any other credit reporting agency?
- 2. Have you or has anyone you know ever worked for, a bank, credit card company or other business that reports credit information or deals with credit disputes?
- 3. Have you or has anyone you know ever worked for a court or taxing authority?
- 4. Have you ever been a party to a lawsuit? If so, state: (a) Whether you were a plaintiff or a defendant; (b) what kind of case it was; and (c) what the outcome was.
- 5. Do you believe that there is too much regulation of business?
- 6. Do you view another person negatively simply because that person has brought a lawsuit against someone else?
- 7. Do any of you believe that under no circumstances should any individual or consumer ever sue another person or business?

- 8. Do you believe that legitimate lawsuits cause insurance rates to be too high?
- 9. Do you have any strong beliefs about tort reform?
- 10. Do you have any strong beliefs about class action lawsuits?
- 11. Do you have any strong beliefs about consumer lawsuits?
- 12. Do you have a problem with punitive damages which are damages intended to punish a defendant and deter future wrongful conduct?
- 13. Do you believe that ability to use credit to purchase or lease goods or services is not important to consumers or the U.S. economy?
- 14. Do you believe that information on credit reports is not important?
- 15. Do you believe that one's credit rating is not important?

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

BY: /s/ John Soumilas

JAMES A. FRANCIS JOHN SOUMILAS GREGORY GORSKI Land Title Building, 19th Floor 100 South Broad Street Philadelphia, PA 19110 (215) 735-8600

DAVID A. SEARLES **DONOVAN SEARLES, LLC** 1845 Walnut Street, Suite 1100 Philadelphia, PA 19103 (215) 732-6067

Dated: April 26, 2010

CERTIFICATE OF SERVICE

I, John Soumilas, hereby certify that, on this date, I caused a true and correct copy of the foregoing Plaintiffs' Proposed Voir Dire to be served by way of ECF Notification, upon the following:

Catherine Olanich Raymond, Esquire Christie Pabarue Mortensen & Young 1880 JFK Boulevard, 10th Floor Philadelphia, PA 19103

> Barry Goheen, Esquire Lewis P. Perling, Esquire King & Spalding 1180 Peachtree Street, NW Atlanta, GA 30309-3521

Attorneys for Defendant Equifax Information Services LLC

FRANCIS & MAILMAN, P.C.

/s John Soumilas

JOHN SOUMILAS Attorneys for Plaintiff Land Title Building, 19th Floor 100 South Broad Street Philadelphia, PA 19110 (215) 735-8600

DATE: April 26, 2010